



Competitive Carriers Association
Rural • Regional • Nationwide®

October 13, 2016

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE
WT Docket No. 10-208: *Universal Service Reform - Mobility Fund*

Dear Ms. Dortch:

On October 11, 2016, representatives of Competitive Carriers Association (CCA) and United States Cellular Corporation (U.S. Cellular) (along with other individuals listed below) met with FCC Chairman Tom Wheeler and Ryan Palmer, Division Chief, Telecommunications Access Policy Division, Wireline Competition Bureau, to discuss rural mobile broadband coverage in West Virginia as well as the potential creation of a Mobility Fund II.

During the course of the discussion, U.S. Cellular stressed the need for sufficient and predictable funding in any Mobility Fund II to provide LTE service to unserved and underserved areas of the country. Based upon a recent blog post by Wireless Telecommunications Bureau Chief Jon Wilkins that at least 550,000 road miles remain unserved by 4G LTE,¹ the cost of covering these areas is likely to exceed \$20 billion based upon U.S. Cellular's recent experience in constructing and completing Auction 901 projects.²

U.S. Cellular also stressed that there are carriers including itself and other CCA members that continue to devote significant amounts of ongoing USF support to constructing new towers in unserved and underserved areas. U.S. Cellular and CCA argued that the FCC must ensure that any Mobility Fund II distribution mechanism must be at least \$500 million per year and guarantee funding for very high cost areas such as West Virginia. Absent this guarantee, it will be decades before any meaningful support is distributed to states like West Virginia, once again leaving rural consumers behind the mobile revolution.

¹ Jon Wilkins, *Mobility Fund II: Improving the Data We Use to Identify & Close Mobile Coverage Gaps*, FCC Blog, Sept. 20, 2016, available at <https://www.fcc.gov/news-events/blog/2016/09/30/mobility-fund-ii-improving-data-we-use-identify-close-mobile-coverage>.

² See *ex parte* Letter from David LaFuria, Counsel for United States Cellular Corporation, Lukas, Nace, Gutierrez & Sachs, LLP to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-208 (filed May 31, 2016).

U.S. Cellular and CCA also noted that coverage in rural areas cannot be considered ubiquitous for consumers in areas served only by a CDMA carrier or a GSM carrier until carriers have universally implemented VoLTE roaming and all consumers have access to devices capable of receiving interoperable VoLTE service.

CCA also explained the importance of preserving existing service provided in rural America by competitive carriers and the need for an equitable transition from a legacy support system to any new support mechanism.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
EVP & General Counsel
Competitive Carriers Association

Meeting Attendees:

cc: Hon. Joe Manchin
Hon. Tom Wheeler
Ryan Palmer, Wireline Competition Bureau, FCC
Alex Damato, Senator Manchin's Office
Peggy Hawse, Senator Manchin's Office
Justin Ray, Field Staff to Senator Manchin
Ken Meyers, U.S. Cellular
Grant Spellmeyer, U.S. Cellular
Steve Berry, CCA
Tim Donovan, CCA
Willy Pirtle, Shentel
Chris Kyle, Shentel
Diane Beall, Canaan Valley Volunteer Fire Department
Joseph Strait, Canaan Valley Volunteer Fire Department
Sandford (Sandy) Green, Fire Chief and Area Liaison, West Virginia Department
of Homeland Security